

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

CRUZ APONTE, ET AL.

Plaintiffs

v.

CARIBBEAN PETROLEUM CORP., ET AL.

Defendants

Civil No. 09-2092 (FAB)

IN THE MATTER OF:

CAPE BRUNY TANKSCHIFFARHTS GMBH AND CO. KG;

AND

CAPE BRUNY SHIPPING COMPANY LTD.

Plaintiffs-Petitioners

Civil No. 10-1337 (FAB)

**AMENDED JOINT MOTION FOR ENTRY OF STIPULATED
CONFIDENTIALITY ORDER**

TO THE HONORABLE COURT:

The plaintiffs-petitioners in Civil Number 10-1337 (FAB), Cape Bruny Tankschiffarhts GmbH and Co. KG and Cape Bruny Shipping Company Ltd.; and the Claimant, Commonwealth of Puerto Rico, without waiving its sovereign immunity and the 11th Amendment Immunity, hereby respectfully request for entry of the Stipulated Confidentiality Order form attached hereto as Exhibit 1 in order for all parties of record to have an opportunity to enter into the stipulation had have access to certain documents produced by the Federal Bureau of Investigations ("FBI") which the FBI has consented to be produced in discovery in the captioned case subject to conditions of confidentiality.

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Any party or their attorneys, experts or agents wishing to have access to such confidential records will need to execute an Acknowledgment of Receipt of Stipulated Confidentiality Order form attached hereto as Exhibit A.

WHEREFORE, movants respectfully pray for the Court to enter the Stipulated Confidentiality Order and thus compelling all parties wishing to have access to the confidential records to first execute an Acknowledgment thereof as set forth in Exhibit A.

RESPECTFULLY SUBMITTED.

At San Juan, Puerto Rico, this 22nd day of October, 2014.

I HEREBY CERTIFY that on this same date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system that will send notification of such filing automatically to all counsel of record.

s/Maraliz Vázquez-Marrero
Maraliz Vázquez Marrero
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Department of Justice
Federal Litigation Division
On behalf of the Commonwealth of Puerto Rico, without waiving it's sovereign immunity and the 11th Amendment Immunity
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